

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LETICIA FRANCINE STIDHUM,

Plaintiff,

-against-

161-10 HILLSIDE AUTO AVE, LLC d/b/a Hillside
Auto Outlet, HILLSIDE AUTO MALL INC. d/b/a
Hillside Auto Mall, ISHAQUE THANWALLA,
JORY BARON, RONALD M. BARON, and
ANDRIS GUZMAN,

Defendants.

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Case No.: 1:21-cv-7163 (HG) (RLM)

**DECLARATION OF
JORY BARON**

Jory Baron declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am a Defendant in the above-referenced case.
2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge.
3. I have conducted a search of my telephone for all text messages related to the Plaintiff.
4. Other than the text messages I have already produced, I am not in possession, custody, or control of any responsive text messages.
5. I also searched my emails and am not in possession, custody, or control of any responsive emails other than those with my counsel.
6. I do not recall exchanging any emails with the Plaintiff.
7. I did not conduct any search for the weekly sales logs because I do not maintain such records in my role at either of the Corporate Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 17, 2023.

A handwritten signature in black ink, appearing to be 'JB' with a stylized flourish, positioned above a horizontal line.

Jory Baron